SF FILE: LAD001700756

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VI
1201 ELM STREET
DALLAS, TEXAS 75270

April 30, 1987

MEMORANDUM

SUBJECT: Monsanto Agricultural Products Company
Luling, Louisiana

FROM: Anthony L. Gardner
Superfund Enforcement Section (6H-EE)

TO: File: LAD001700756

Larry Adams, Principal Environmental Specialist for Monsanto Agricultural Products Company, Luling, Louisiana met with Larry Wright (6H-EE), Anthony Gardner (6H-EE), and Steve Rubin (6H-CP) in the Regional Office on April 20, 1987, to discuss dioxin sampling data from the Dioxin Control Area (Area) at the Luling plant and the management proposal for the area.

As a follow-up to the joint sampling study conducted by EPA's contractor, PRC Engineering and Monsanto in February 1986, Monsanto collected 94 additional core samples from the Area and 9 sediment samples from the ditch west of the Area. These samples were collected to confirm and refine the boundaries of the Area. Monsanto analyzed 61 core samples and all 9 sediment samples. The dioxin concentration in the core samples ranged from <0.10 - 348.00 ppb and ranged from <0.10 - 18.9 ppb in the sediment samples. The data is tabulated in the April 17, 1987 letter from Mr. Adams to Mr. Gardner and generally confirms the data collected in February 1986.

Using the new core data and the data from previous samplings, concentration isopleths were obtained using a computer model. The objective in the modeling was to obtain a contour plot of the concentrations and to obtain a prediction of the 1.0 ppb boundary. The modeling output will be used to redefine the boundaries of the control area.

Monsanto has developed a strategy to address the dioxin contamination detected in the ditch. A new ditch will be provided to allow runoff to bypass the contaminated section of the ditch. The section of the ditch where detectable dioxin levels were seen will be backfilled and covered with plastic and shell. The fill area will be sloped to allow surface drainage to flow in the normal pattern.

Monsanto has redefined the boundaries of the control area and will erect a cable fence around those areas outside the Amines Production unit to maximize the life of the plastic/shell cover. Most of the control area within the Amines unit is covered with asphalt or concrete. The

company's Dioxin Management Plan for the Area will be revised and resubmitted to EPA by May 1, 1987.

It was explained to Mr. Adams that he should begin providing his information to the RCRA program. His initial contact would be Mr. Rubin with the RCRA Permit Section. Mr. Rubin explained that the Dioxin Control Area should probably be addressed in a separate section of the RCRA permit. Mr. Wright explained the Superfund Program was initially involved as a result of its involvement in the National Dioxin Strategy (NDS) investigation. Since the NDS investigation was completed, Superfund would no longer be involved with the activities at the Luling plant, but would defer to the RCRA program and the RCRA permitting process to address future control measures at the site. Mr. Adams was requested to provide both programs with copies of the revised Dioxin Management Plan for their respective site files.

cc: Bob Hannesschlager, 6H-E
Steve Rubin, 6H-CP
Allyn Davis, 6H
Sam Becker, 6H-C